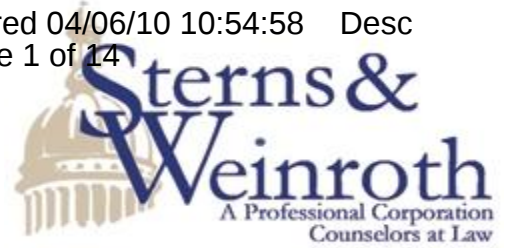


Case 07-15294-RTL Doc 114-3 Filed 04/06/10 Entered 04/06/10 10:54:58 Desc
50 West State Street
P.O. Box 1298
Trenton, NJ 08607-1298
(609) 392-2100, Fax (609) 392-7956
TAX ID# 22-3268505

Exhibit B - Invoice of Services

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Thomas J. Orr, Trustee
321 High Street
Burlington, NJ 08016

Invoice 58155
March 25, 2010

Matter Number: 51185-00074 - AD

Re: Imperial Oil Co., Inc.

For Services Rendered Through March 23, 2010

Current Fees	28,913.50
Current Disbursements	805.04
Total Current Invoice	29,718.54

Balance Forward	0.00
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Total Due	29,718.54
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Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Fees

Date	Atty	Description	Hours	Amount
07/18/07	AD	Reviewing background materials. Telephone call with RPZoller re superfund suit, etc. Telephone call with T. Orr re strategy to get started.	1.20	360.00
07/19/07	AD	Conferring with T. Orr re commentary from environmental counsel, etc.	0.20	60.00
07/20/07	RPZ	E-mail exchange with A. Dobin re conference call with T. Orr re pending litigations, etc.	0.20	66.00
07/26/07	AD	Reviewing letter from environmental counsel re pending actions.	0.60	180.00
07/26/07	AD	Telephone call with T. Orr and RPZoller re environmental litigation.	0.60	180.00
07/26/07	RPZ	Commence review of background letter from Imperial Oil's environmental counsel re background to issues with the United States.	0.50	165.00
07/26/07	RPZ	Participating in telephone conference call with T. Orr, Bankruptcy Trustee, re representation on pending matters, etc.	0.40	132.00
07/27/07	AD	Telephone call from trustee re judge's intent to dismiss adversary.	0.10	30.00
07/27/07	AD	Drafting retention application and electronic filing and service of same.	0.70	210.00
07/27/07	AD	E-mail to trustee re identity of counsel handling DOD claim.	0.10	30.00
07/27/07	AD	Conferring with trustee re call from USA. Letter to P. Staiano re request for turnover of research.	0.10	30.00
07/30/07	AD	Conferring with Judge Lyons chambers re adversary to be dismissed.	0.20	60.00
08/01/07	AD	Telephone call from S. Bauer re EPA action.	0.40	120.00
08/01/07	RPZ	Participating in telephone conference call with U.S. Attorneys' Office and A. Dobin re various issues pertaining to litigation matters, etc.	0.60	198.00
08/02/07	RPZ	Commence review of extensive materials pertaining to analysis of Trustee's claims with respect to motion to enforce settlement and related issues, etc.	1.50	495.00
08/03/07	AD	E-mail exchange with counsel to EPA re 341 meeting attendance.	0.20	60.00
08/03/07	RPZ	Continuing to evaluate and assess Trustee's position with respect to pending claims of the United States.	0.20	66.00
08/03/07	RPZ	Email exchange with attorney Bauer re scheduling issues before Judge Thompson and Magistrate Judge Hughes.	0.20	66.00
08/03/07	RPZ	Follow up telephone call to attorney S. Bauer re same.	0.20	66.00
08/06/07	AD	Telephone call with Tom Orr re call from DEP.	0.30	90.00
08/07/07	AD	Conferring with trustee re: DEP demand.	0.20	60.00
08/07/07	AD	Telephone call with S. Bauer, trustee, CETorkelson et al re	0.40	120.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
		arsenic filter issue permitting by DEP, Trustee's role.		
08/07/07	AD	Telephone call with trustee and CETorkelson re strategy.	0.30	90.00
08/07/07	AD	Conferring with JLCordes re: DEP issue as to arsenic filter.	0.30	90.00
08/07/07	AD	Telephone call to M. Byrne and telephone call to J. Mahir and telephone to trustee.	0.40	120.00
08/07/07	JLC	Conferring with ADobin re background info re arsenic filter.	0.20	40.00
08/07/07	JLC	Conference call with ADobin and M. Byrne.	0.20	40.00
08/07/07	JLC	Conference call with ADobin and J. Maher.	0.30	60.00
08/07/07	JLC	Conference call with ADobin and T. Orr.	0.30	60.00
08/07/07	JLC	Drafting correspondence to J. Maher confirming conversation.	0.60	120.00
08/07/07	CET	Conference call with client and EPA, etc., regarding arsenic pump.	0.40	100.00
08/07/07	CET	Office conference with ADobin regarding status and environmental issues.	0.30	75.00
08/07/07	RPZ	Telephone call from and to Provorny, counsel to Imperial's owners, re status of pending motions and positions before court, etc.	0.30	99.00
08/07/07	RPZ	Multiple emails and telephone calls with attorney Bauer and Provorney re scheduling issues before Judge Thompson.	0.40	132.00
08/07/07	RPZ	Conference with ADobin re Trustee's position on motion.	0.30	99.00
08/08/07	JLC	Revising correspondence to J. Maher.	0.30	60.00
08/08/07	JLC	Conferring with ADobin re status of remediation at property and revisions to letter.	0.10	20.00
08/08/07	AD	Reviewing letter to NJDEP re arsenic filter responsibility.	0.10	30.00
08/08/07	AD	Telephone call with trustee re outcome of 341 meeting.	0.10	30.00
08/08/07	RPZ	Reviewing and responding to multiple emails re scheduling issues and site inspection at Imperial facility.	0.40	132.00
08/08/07	RPZ	Participating in telephone conference call with attorneys Bauer and Provorney re scheduling issues before Judge Thompson, etc.	0.40	132.00
08/09/07	AD	Telephone call from trustee re further environmental issues.	0.10	30.00
08/10/07	AD	Conferring with RPZoller re environmental litigation status.	0.20	60.00
08/10/07	RPZ	E-mail exchange with U.S. attorney, S. Bauer re Trustee's position on motion to enforce settlement and scheduling issues pertaining to same.	0.30	99.00
08/10/07	RPZ	Conference with ADobin re preliminary opinions with respect to Trustee's legal issues and pending motions, etc.	0.40	132.00
08/10/07	RPZ	Reviewing letter to Judge Thompson re briefing and scheduling issues on motion to enforce settlement, etc.	0.20	66.00
08/15/07	RPZ	Continuing analysis of legal issues pertaining to Trustee's position with respect to motion to enforce settlement.	0.30	99.00
08/15/07	RPZ	Email exchange with ADobin re Trustee's legal position to motion	0.20	66.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
		to enforce.		
08/17/07	JLC	E-mails from/to R. Lehr re letter to DEP. Forwarding same to ADobin. Conferring with ADobin re same. E-mail from ADobin re conference call with EPA.	0.50	100.00
08/17/07	AD	Telephone call with trustee and EPA/DEP (various times).	0.70	210.00
08/17/07	REJ	E-mail ADobin re property access issue, conference ADobin re same.	0.50	187.50
08/20/07	JLC	Conferring with RJayne re status in preparation for conference call. Conference call with ADobin, RJayne, T. Orr and EPA.	0.80	160.00
08/20/07	REJ	E-mail ADobin re conference call EPA, counsel for Tenant, conference JLCordes re background.	1.00	375.00
08/20/07	REJ	Conference call T. Orr, EPA/DOJ and ADobin re logistics re site access.	0.30	112.50
08/20/07	AD	Telephone call with EPA, JLCordes and REJayne and trustee re access issues.	0.40	120.00
08/21/07	JLC	Conferring with ADobin re status.	0.10	20.00
08/21/07	AD	Conferring with JLCordes re recommendation.	0.10	30.00
08/21/07	AD	Conferring with RPZoller re strategy to conclude case.	0.20	60.00
08/21/07	AD	Telephone call with and trustee re recommendation.	0.40	120.00
08/21/07	REJ	Conference call with EPA, T. Orr re access to property, abandoning property and site security.	0.20	75.00
08/21/07	RPZ	Continuing analysis of Trustee's position with respect to pending motion to enforce settlement and related matters.	0.50	165.00
08/21/07	RPZ	Participating in lengthy telephone conference call with A. Dobin and T. Orr re litigation/settlement position, etc.	0.60	198.00
09/04/07	AD	E-mail exchange with with EPA re scheduling.	0.20	60.00
09/04/07	RPZ	Reviewing correspondence re scheduling issues in the debt collection action and the meet and confer obligations under Federal Rules of Procedure.	0.40	132.00
09/04/07	RPZ	Participating in telephone conference call with U.S. attorney S. Bauer and G. Provorny, Esq.	0.40	132.00
09/04/07	RPZ	Lengthy telephone calls from and to S. Bauer re settlement possibilities in the United States' enforcement action, etc.	0.50	165.00
09/05/07	AD	Telephone call from S. Bauer re access issues.	0.10	30.00
09/05/07	AD	Conferring with RPZoller re US EPA discussions.	0.20	60.00
09/05/07	RPZ	Conference with ADobin re settlement options with the United States.	0.20	66.00
09/05/07	RPZ	Telephone calls from and to U.S. attorney S. Bauer to discuss settlement possibilities, etc.	0.30	99.00
09/06/07	AD	Conferring with trustee re security at sale.	0.20	60.00
09/07/07	AD	E-mail exchange with B. Baner re meeting.	0.10	30.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
09/07/07	RPZ	Reviewing letter from attorney Proverney to Judge Thompson re individual officer's positions on opposing U.S. 's motion to inforce settlement.	0.20	66.00
09/07/07	RPZ	Telephone calls from and to U.S. attorney Bauer, C. Proverney re opposition to motion to enforce settlement and issues ertaining to potential settlement of Trustee's claims, etc.	0.50	165.00
09/10/07	AD	Conferring with RPZoller re status of district court litigation.	0.20	60.00
09/10/07	RPZ	Telephone call to U.S. attorney S. Bauer, Judge Thompson's chambers and C. Provorney re adjournment of the United States motion to enforce settlement, etc.	0.50	165.00
09/10/07	RPZ	Telephone conference with ADobin and T. Orr, Trustee, re settlement issues and negotiations. wiith United States.	0.50	165.00
09/10/07	RPZ	Letter to Judge Thompson confirming adjournment of motion to enforce settlement and new deadlines for submission of opposition to same.	0.40	132.00
09/10/07	RPZ	Telephone conference with T. Orr re scheduling issues pertaining to pending motions and possible settlement with United States.	0.20	66.00
09/10/07	RPZ	Telephone call from C. Provorney re revised schedule for opposition to the United States motion to compel settlement and the individual principals possible filing of a motion to intervene.	0.20	66.00
09/10/07	RPZ	Telephone call from T. Orr, Trustee, re update on settlement negotiations with United States to resolve motion to enforce settlement, etc.	0.30	99.00
09/14/07	RPZ	Telephone conference with U.S. attorney S. Bauer re efforts to resolve the United States motion to enforce settlement and further discussions re the Trustee's settlement position with the United States.	0.40	132.00
09/14/07	RPZ	Telephone call from attorney Proverney re whether Trusee will oppose motion to enforce settlement before Judge Thompson.	0.10	33.00
09/18/07	AD	E-mail exchange with USDOJ re meeting.	0.10	30.00
09/18/07	AD	Telephone call with R. Zoller re conversations with EPA on settlement.	0.30	90.00
09/18/07	RPZ	Telephone calls from and to U.S. attorney S. Bauer re negotiations of possible settlement with the United States.	0.40	132.00
09/18/07	RPZ	Conference with ADobin re settlement issues and memorandum to file re non-monetary terms of any proposed settlement, etc.	0.30	99.00
09/19/07	AD	E-mail exchange with EPA counsel re conference call.	0.10	30.00
09/19/07	AD	Telephone call with EPA and trustee re barrels.	0.30	90.00
09/19/07	AD	Telephone call with trustee re strategy.	0.10	30.00
09/19/07	AD	E-mail exchange with with trustee re offer from EPA.	0.10	30.00
09/19/07	RPZ	Telephone call from U.S. attorney S. Bauer re initial settlement offer from the United States to settle motion to enforce settlement.	0.20	66.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
09/19/07	RPZ	Conference with ADobin and email exchange with T. Orr re U.S. offer of settlement.	0.20	66.00
09/20/07	AD	E-mail exchange with with trustee re offer and E-mail exchange with RPZoller re same.	0.20	60.00
09/20/07	AD	Telephone call with trustee re status and settlement authority.	0.10	30.00
09/20/07	RPZ	Telephone calls and email exchange with U.S. attorney S. Bauer re settlement negotiations between the United States and the Trustee.	0.30	99.00
09/20/07	RPZ	Email to T. Orr re update on settlement negotiations.	0.20	66.00
09/20/07	RPZ	Telephone calls from and to G. Proverney, Esq. re Trustee's position with respect to motion to enforce settlement, etc.	0.20	66.00
09/20/07	RPZ	Follow up telephone call from U.S. attorney S. Bauer re United States settlement position and email to T. Orr to discuss same.	0.30	99.00
09/21/07	AD	Telephone call with RPZoller and trustee re settlement.	0.40	120.00
09/21/07	RPZ	Telephone call from U.S. attorney S. Bauer re settlement negotiations. between the Trusee and Unied States.	0.20	66.00
09/21/07	RPZ	Conference with ADobin re United States increase settlement offer in connection with motion to enforce judgment, etc.	0.20	66.00
09/21/07	RPZ	Telephone conference with T. Orr and ADobin re negotiation with the United States.	0.20	66.00
09/21/07	RPZ	Telephone call from G. Proverney re Trustee's position with respect to motion to enforce and information re status of settlement negotiations with the United States.	0.20	66.00
09/21/07	RPZ	Telephone call to Judge Thomson's chambers to advise of likely settlement issues between the United States and Trustee and timeframe to confirm same.	0.20	66.00
09/24/07	RPZ	Letter to Judge Thomson advising of tentative settlement with the United States and submission of order addressing same,	0.30	99.00
09/25/07	AD	Reviewing letter to Judge Thompson.	0.10	30.00
09/25/07	RPZ	Reviewing letter from G. Proverney, counsel to the principals of Imperial , re objection to the Trustee's proposed settlement with the United States.	0.20	66.00
09/25/07	RPZ	Conferring with ADobin and reviewing email re process for creditors to object to settlement.	0.20	66.00
10/04/07	RPZ	Reviewing and responding to correspondence from U.S. attorney Bauer re discovery plan and settlement possibilities in federal litigation.	0.30	99.00
10/05/07	AD	E-mail exchange with RPZoller and trustee re settlement status.	0.10	30.00
10/05/07	RPZ	Email exchange with U.S. attorney S. Bauer re consent order and stipulation on settlement on set off motion before Judge Thompson.	0.20	66.00
10/05/07	RPZ	Telephone call and email response to U.S. Attorney Bauer re joint	0.40	132.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
		discovery plan on enforcement action and follow up email to ADobin re status update.		
10/10/07	AD	Telephone call from A. Nazar re Mid-Continental review of notice of abandonment.	0.20	60.00
10/11/07	AD	E-mail exchange with EPA re conference call re abandonment. Conferring with trustee re strategy. Telephone call with trustee and EPA re taking title to materials.	0.60	180.00
10/11/07	RPZ	Email exchange and follow up telephone call with U.S. attorney S. Bauer re proposed stipulation for settlement of enforcement motion, etc.	0.40	132.00
10/11/07	RPZ	Receipt and commence review of proposed stipulation and order to settle enforcement motion, etc.	0.40	132.00
10/16/07	AD	Telephone call with EPA counsel and trustee re issues on abandonment.	0.30	90.00
10/16/07	AD	Drafting limited objection to proposed abandonment and electronic filing and service of same. E-mail to EPA counsel.	0.80	240.00
10/19/07	AD	Drafting status report.	0.20	60.00
10/25/07	AD	Telephone call with S. Bayer, EPA and Trustee re: abandonment issues.	0.40	120.00
10/25/07	AD	Telephone call with S. Bayer re: procedure to object.	0.30	90.00
10/26/07	AD	Telephone call with EPA and Trustee re EPA position on abandonment.	0.60	180.00
10/29/07	RPZ	Reviewing, revising and editing of form of stipulation on settlement of enforcement action. Email exchange with attorney Bauer re comments on stipulation.	0.80	264.00
10/29/07	RPZ	Reviewing and revising proposed order and stipulation to be submitted to Bankruptcy Court in connection with settlement of enforcement action and follow up conference with ADobin re issues to be addressed in bankruptcy stipulation.	0.60	198.00
11/04/07	AD	Reviewing stipulation with EPA.	0.50	150.00
11/05/07	AD	Reviewing EPA opposition to abandonment.	0.40	120.00
11/05/07	AD	Traveling to and from court and appearing before Judge Lyons re abandonment.	0.80	240.00
11/05/07	AD	Conferring with EPA re structure of settlement.	0.30	90.00
11/05/07	AD	Make final revisions to stipulations.	0.30	90.00
11/06/07	AD	Reviewing, revising and finalizing stipulation and e-mail to S. Bauer with comments.	0.80	240.00
11/06/07	RPZ	Reviewing revisions proposed to the government's stipulations resolving motion to enforce, etc.	0.30	99.00
11/08/07	AD	Telephone call with S. Bauer, T. Orr re settlement.	0.40	120.00
11/08/07	AD	Drafting revised paragraph 18 for stipulation.	0.30	90.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
11/09/07	RPZ	Reviewing and responding to emails with attorney S. Bauer re stipulation to be submitted to court.	0.20	66.00
11/14/07	AD	Telephone call with T. Orr and Telephone call with S. Bauer re final deal.	0.30	90.00
11/14/07	AD	Telephone call to S. Iannacone re carve-out.	0.60	180.00
11/14/07	AD	E-mail to S. Bauer re IRS response.	0.20	60.00
11/15/07	AD	Conferring with RPZoller re status of settlement.	0.10	30.00
11/15/07	RPZ	Conference with ADobin re revisions and agreement on proposed stipulations to be submitted to Federal District Court and Bankruptcy Court, and impact on IRS claim on same.	0.20	66.00
11/19/07	AD	E-mail from S. Bauer and e-mail to S. Ianacone re status.	0.20	60.00
11/20/07	AD	E-mail from S. Iannacone re assignment of case to W. Gardner and Telephone call to W. Gardner. E-mail exchange with S. Bauer, counsel to EPA re IRS position and problems with administration.	0.50	150.00
11/20/07	AD	Reviewing submission by EPA to district court.	0.20	60.00
11/28/07	AD	Reviewing Marlboro Township notice re debt. Letter to Marlboro MUA re bankruptcy pending - no payment.	0.40	120.00
11/28/07	AD	Reviewing letter to Judge Thompson. Telephone call to W. Gardner re deal to be made. E-mail from S. Bauer re IRS to withdraw claim.	0.40	120.00
11/30/07	AD	Telephone call with T. Orr and S. Bauer re settlement with IRs.	0.40	120.00
12/03/07	AD	Letter to R. Uscher re challenge to secured claim.	0.40	120.00
12/04/07	AD	Telephone call from Uscher re response to letter.	0.10	30.00
12/05/07	AD	E-mail exchange with S. Bauer re law firm secured claim.	0.20	60.00
12/05/07	AD	Conferring with C. Becker re assignment of claims act and letter to R. Usher.	0.40	120.00
12/05/07	AD	E-mail exchange with R. Uscher and S. Bauer re secured position.	0.30	90.00
12/05/07	CDB	Reaching Assignment of Claims Act of 1940 re the ability to assign a government claim.	1.10	192.50
12/07/07	AD	E-mail from S. Bauer re application of Assignment of Claims Act to situation and e-mail to C. Becker re same.	0.20	60.00
12/07/07	CDB	Reaching Assignment of Claims Act of 1940 re the ability of a non financial institution to assign a government claim.	0.30	52.50
12/08/07	CDB	Reaching Assignment of Claims act of 1940 re the ability of a non financial institution to assign a government claim.	0.40	70.00
12/10/07	AD	Telephone from R. Uscher and e-mail to trustee re same re law firm secured claim.	0.10	30.00
12/11/07	AD	E-mail exchange with S. Bauer re assignment of claims act - law firm secured claim.	0.20	60.00
12/12/07	AD	Reviewing letter from EPA re intention to break locks.	0.10	30.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
12/12/07	AD	E-mail exchange with interested parties re trustee's involvement with the property at this stage.	0.20	60.00
12/12/07	AD	Reviewing information from Uscher and conferring with C. Becker re same.	0.40	120.00
12/12/07	CDB	Reviewing correspondence and documents from R. Uscher concerning the assigned claim to the Imperial Oil proceeds. Research concerning procedural requirements for an assigned claims	2.10	367.50
12/14/07	AD	E-mail to trustee re proposed solution to attorney's lien problem.	0.30	90.00
12/17/07	AD	Telephone call with Trustee re resolving attorney's lien on EPA monies.	0.20	60.00
12/18/07	AD	E-mail to S. Brauer re Trustee's position on attorney's lien.	0.50	150.00
01/02/08	AD	E-mail from EPA re expectation that settlement will be approved internally and e-mail to trustee re giving authority to set off in possible violation of law firm's rights.	0.30	93.00
01/02/08	AD	Drafting motion to approve settlement and expunge secured claim.	0.70	217.00
01/03/08	AD	Drafting motion to approve settlement.	0.80	248.00
01/09/08	AD	E-mail from R. Uscher re status.	0.10	31.00
01/09/08	AD	E-mail T. Orr following up on EPA request.	0.10	31.00
01/18/08	AD	Telephone call from F. Vecchione re retainer remaining at firm.	0.10	31.00
01/18/08	AD	Telephone call with F. Vecchione re retainer to be returned and Telephone call with T. Orr re same.	0.20	62.00
01/20/08	AD	E-mail exchange with S. Bauer re status of settlement.	0.10	31.00
01/24/08	AD	Telephone call with trustee re moving forward with settlement.	0.20	62.00
01/24/08	AD	E-mail to S. Bauer, counsel to EPA re moving forward with settlement and proposed motion for approval.	0.20	62.00
01/25/08	AD	E-mail from S. Bauer.	0.20	62.00
01/25/08	AD	Reviewing and revising Certification.	0.30	93.00
01/25/08	AD	Reviewing amended schedule "B" and e-mail to trustee re same.	0.20	62.00
01/27/08	AD	Drafting form of order and certificate of service re motion for approval of settlement (mining e-mails for additional services addresses).	0.60	186.00
01/28/08	AD	E-mail exchange with S. Bauer re certification for motion.	0.20	62.00
01/28/08	AD	E-mail exchange with S. Bauer re procedure for approval and abandonment of property.	0.20	62.00
01/28/08	AD	Drafting 9019 Notice and electronic filing and service of same.	0.60	186.00
01/28/08	AD	Electronic filing and service of motion to approve settlement and amended notice of motion.	0.50	155.00
02/05/08	AD	Letter T. Orr re money from Gibbons.	0.20	62.00
02/06/08	AD	Reviewing proposed abandonment and e-mail suggested new language.	0.20	62.00

Thomas J. Orr, Trustee
Re: Imperial Oil Co., Inc.
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Date	Atty	Description	Hours	Amount
02/06/08	AD	Reviewing letter from K. Caminiti re contact from Liberty Mutual and e-mail to RPZoller re same.	0.20	62.00
02/19/08	AD	E-mail exchange with R. Uscher re adjournment request for hearing on approval of settlement.	0.20	62.00
02/19/08	AD	Reviewing objections from Principals and Uscher.	0.40	124.00
02/19/08	AD	E-mail exchange with S. Bauer re conference call re objections filed.	0.20	62.00
02/19/08	AD	Conferring with trustee re status of objections, etc.	0.20	62.00
02/20/08	AD	Reviewing principal's objection to proposed settlement and Peckar and Abramson's objection.	0.60	186.00
02/20/08	AD	Legal research re right of set off/mutuality of debt for government entities.	0.30	93.00
02/20/08	AD	Drafting response to owners' objection.	1.40	434.00
02/20/08	AD	Telephone call with S. Bauer and T. Orr re responding to objections.	0.80	248.00
02/20/08	AD	E-mail to R. Uscher re consent to adjournment.	0.20	62.00
02/20/08	AD	Legal research re Federal Debt Collection Act and post-petition status of corporate Chapter 7 debtor.	0.50	155.00
02/20/08	AD	Telephone call from M. Harrison re clients various claims.	0.10	31.00
02/20/08	RPZ	Reviewing emails and follow up with ADobin re status of motion to accept settlement, etc.	0.20	68.00
02/21/08	AD	E-mail exchange with S. Bauer re process to approve settlement between EPA and Peckar firm.	0.30	93.00
02/26/08	JLC	E-mail from ADobin re status/notice of abandonment.	0.10	21.00
02/26/08	AD	Reviewing objection to abandonment from NJDEP and e-mail S. Bauer re same.	0.30	93.00
02/27/08	JLC	E-mail to/from ADobin re status.	0.10	21.00
02/28/08	JLC	Conferring with ADobin re status.	0.10	21.00
02/29/08	AD	E-mail exchange with S. Bauer re papering settlement with Peckar & Abramson.	0.20	62.00
03/03/08	AD	Reviewing NJDEP objection (refiled) to abandonment and e-mail S. Bauer re EPA's intervention.	0.20	62.00
03/06/08	AD	Reviewing stipulation between EPA and Peckar & Abramson.	0.20	62.00
03/12/08	AD	E-mail exchange with S. Bauer re form of stipulation to be filed with the court.	0.20	62.00
03/12/08	AD	Electronic filing and service of stipulation between EPA and Peckar and Abramson.	0.30	93.00
03/17/08	AD	Reviewing and revising certification in response to objection by owners.	0.50	155.00
03/19/08	AD	E-mail to S. Bauer re proposed response to objection.	0.10	31.00
03/20/08	AD	E-mail exchange with S. Bauer and trustee re filing response to	0.10	31.00

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		objection to settlement motion.		
03/20/08	AD	Finalizing response and electronic filing and service of same and letter to G. Jacobson re service of response.	0.60	186.00
03/31/08	AD	Preparing for hearing.	0.70	217.00
03/31/08	AD	Traveling to and from court.	0.80	248.00
03/31/08	AD	Appearing before Judge Lyons re motion to approve settlement.	1.30	403.00
03/31/08	AD	Conferring with S. Bauer following court re issues going forward.	0.40	124.00
03/31/08	AD	Conferring with RPZoller re strategy.	0.40	124.00
03/31/08	RPZ	Conference with ADobin re bankruptcy court's denial of motion to approve settlement and analyzing the Trustee's position going forward, etc.	3.00	1,020.00
04/01/08	AD	Conferring with trustee re going forward strategy.	0.30	93.00
04/02/08	AD	Telephone from S. Bauer re response to subpoena and going forward.	0.20	62.00
04/02/08	AD	Letter to P. Staiano re request for waiver of attorney client privilege.	0.30	93.00
04/02/08	AD	Email to Trustee re access to documents being requested by USEPA.	0.20	62.00
04/02/08	AD	Letter from C. Provorny re objection to waiver of privilege.	0.10	31.00
04/03/08	AD	Conferring with trustee re motion to abandon.	0.20	62.00
04/03/08	AD	Drafting motion to authorize abandonment.	1.10	341.00
04/04/08	AD	Reviewing and revising motion for approval of abandonment and related pleadings, including application for order shortening time and limiting notice.	1.60	496.00
04/06/08	AD	Finalize motion to abandon and application for order shortening time and limiting notice and electronic filing and service of same and e-mail to Judge Lyons re filing of application and need for emergent ruling.	0.70	217.00
04/07/08	AD	Telephone call from court re scheduling motion.	0.10	31.00
04/07/08	AD	Reviewing order shortening time.	0.10	31.00
04/07/08	AD	Arranging service of emergent motion for abandonment.	0.20	62.00
04/07/08	AD	Telephone call from S. Bauer re intention of motion to abandon.	0.20	62.00
04/07/08	AD	Drafting service list and Conferring with MOBrien re same and letter serving motion.	0.60	186.00
04/07/08	AD	Telephone call from P. Staiano re outcome of motion for settlement/need to abandon.	0.40	124.00
04/10/08	AD	Conferring with trustee re status and strategy - pursuing preferences.	0.10	31.00
04/10/08	AD	Drafting certificate of service complying with order shortening time and limiting notice and electronic filing and service of same.	0.50	155.00
04/11/08	AD	E-mail exchange with S. Bauer re need for appearance at hearing	0.20	62.00

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Date	Atty	Description	Hours	Amount
		4/14/		
04/14/08	AD	Traveling to and from court and appearing at emergent motion for abandonment.	0.90	279.00
04/14/08	AD	E-mail exchange with C. Provorny and Bauer re trustee's intent re abandonment of account receivable/no more participation in litigation.	0.20	62.00
04/15/08	AD	Telephone call with S. Bauer and C. Provorny and telephone call to trustee re no participation in motion to enforce.	0.40	124.00
04/21/08	AD	Telephone call from F. Steele re status of abandonment, etc.	0.20	62.00
05/21/08	AD	E-mail from S. Bauer re discovery requests and conferring with trustee re response to discovery requests and e-mail S. Bauer re issues of attorney client privilege and waiver prevent current response.	0.30	93.00
06/11/08	DJM	Composing and sending e-mail to T. Orr re preference documentation.	0.10	21.00
06/11/08	AD	E-mail from S. Bauer re request for conference call.	0.10	31.00
06/12/08	DJM	Receiving and reviewing e-mail from T. Orr with documents supporting preference action.	0.30	63.00
06/16/08	AD	Telephone call with C. Provorny and S. Bauer re disposition of tax refund and other matters to facilitate settlement and Telephone call to trustee re same.	0.60	186.00
06/16/08	AD	Conferring with DJMcDonough re research as to right of setoff.	0.20	62.00
06/16/08	AD	E-mail exchange with trustee re tax refund sitting with principal's counsel and request for abandonment.	0.50	155.00
06/17/08	DJM	Research re termination of right of setoff.	0.60	126.00
06/17/08	DJM	Reviewing case law on setoff.	1.10	231.00
06/18/08	AD	E-mail to S. Bauer re possible resolution of competing claims to tax refund.	0.20	62.00
06/19/08	DJM	Conference with ADobin re preference of Rieke.	0.20	42.00
06/19/08	DJM	Telephone call with PNC Bank re date of attachments.	0.30	63.00
06/19/08	DJM	Composing and sending e-mail to T. Orr requesting more information on attachments.	0.10	21.00
06/19/08	DJM	Drafting, reviewing and revising complaint to recover preferential payment from Rieke.	0.50	105.00
06/19/08	DJM	Receiving and reviewing e-mail from T. Orr re information as to Rieke preference.	0.10	21.00
06/19/08	AD	Conferring with DJMcDonough re proving amount of preference.	0.20	62.00
06/23/08	DJM	Receiving and reviewing e-mail from ADobin with cites for setoff.	0.10	21.00
06/23/08	DJM	Composing and sending e-mail to ADobin with legal cites against right to setoff.	0.30	63.00
06/23/08	AD	E-mail from S. Bauer re IRS setoff issue and forward to	0.10	31.00

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		DJMcDonough.		
06/26/08	DJM	Conference with ADobin re status of preferences.	0.10	21.00
06/26/08	AD	Conferring with DJMcDonough re no preference suit to be brought.	0.10	31.00
07/03/08	DJM	Receiving and reviewing e-mail chain between ADobin and IRS re setoff.	0.10	21.00
07/03/08	DJM	Reviewing case law cited by IRS, preparing memo on same.	0.60	126.00
07/08/08	DJM	Researching cases on setoff and drafting memo on same.	0.80	168.00
07/08/08	DJM	Conference with ADobin re right to setoff and waiver.	0.10	21.00
07/09/08	AD	Reviewing memo re setoff rights.	0.20	62.00
08/15/08	AD	E-mail to S. Bauer re challenge to waiver of setoff argument.	0.20	62.00
08/18/08	AD	E-mail from S. Bauer re offer of \$2,500.00.	0.10	31.00
09/22/08	AD	Telephone call with trustee re accepting offer on disputed tax refund issued.	0.10	31.00
09/26/08	AD	Drafting 9019 notice re tax refund.	0.30	93.00
09/28/08	AD	Reviewing, revising and finalizing 9019 Notice re tax refund and electronic filing and service of same.	0.30	93.00
09/29/08	AD	E-mail exchange with S. Bauer re notice of settlement.	0.10	31.00
10/02/08	AD	Telephone call with trustee re logistics of turnover of refund check.	0.20	62.00
10/02/08	AD	E-mail to S. Bauer re abandonment of insurance coverage issue.	0.10	31.00
10/13/08	AD	Letter from C. Provorny and letter to trustee re tax refund check.	0.20	62.00
10/31/08	AD	E-mail exchange with trustee re distributing payment from IRS check.	0.10	31.00
03/09/10	AD	Drafting narrative and reviewing bill.	0.40	130.00
03/23/10	TO	Preparing S&W fee application.	1.50	150.00
Total Fees				28,913.50

Fee Recap

Timekeeper	Hours	Rate/Hour	Amount
Robert P. Zoller	20.80	330.00	6,864.00
Robert P. Zoller	3.20	340.00	1,088.00
Andrea Dobin	25.60	300.00	7,680.00
Andrea Dobin	30.70	310.00	9,517.00
Andrea Dobin	0.40	325.00	130.00
Christopher E. Torkelson	0.70	250.00	175.00
Jennifer L. Cordes	3.40	200.00	680.00
Jennifer L. Cordes	0.30	210.00	63.00
Roxanne E. Jayne	2.00	375.00	750.00
Craig D. Becker	3.90	175.00	682.50
Douglas J McDonough	5.40	210.00	1,134.00

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Timekeeper	Hours	Rate/Hour	Amount
Terri Olsen	1.50	100.00	150.00
Fees for Legal Services	97.90		28,913.50

Disbursements		
Date	Description	Amount
02/29/08	Westlaw research AD 2/20/08	46.59
07/31/08	Westlaw research DJM 7/8/08	25.03
	Telecopy	322.00
	Photocopying	121.40
	Postage	17.40
	Travel & related expenses	8.00
	Federal Express	264.62
Total Disbursements		805.04
Total Fees and Disbursements		29,718.54
Total Current Invoice		29,718.54
Balance Forward		0.00
Total Amount Due		29,718.54